

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

JASON ODOM, and SAHARA JACKSON, on behalf of
themselves and all others similarly situated,

Plaintiff,

-against-

INTERNATIONAL TRENDZ, LLC and

ISMAIL QADAR,

Case 1:22-cv-07514

Rule 26 disclosures

DEFENDANT'S RULE 26 INITIAL DISCLOSURES

Per the Case Management Plan (Doc. 15) and Federal Rule of Civil Procedure 26(a)(1)(A)(i-iv), Defendants International Trendz, LLC and Ismail Qadar disclose the following:

I. Individuals reasonably likely to have information that bears significantly on the claims and defenses, identifying the subject of information:

- a. Person: Jason Odom**
c/o Plaintiff's Counsel

Subject: Information pertaining to Plaintiff's claims and Defendants' defenses.

- b. Person: Sahara Jackson**
c/o Plaintiff's Counsel

Subject: Information pertaining to Plaintiff's claims and Defendants' defenses.

- c. Person: Corporate Representative for International Trendz, LLC.**
c/o Ian Smith, Esq.
Spire Law, LLC
2572 W. State Road 426, Suite 2088
Oviedo, Florida 32765
(407) 494-0135

Subject: Employment and compensation of Plaintiff, Plaintiff's duties, Plaintiff's schedule and hours worked, and the like.

d. Person: Ismail Qadar

c/o Ian Smith, Esq.
Spire Law, LLC
2572 W. State Road 426, Suite 2088
Oviedo, Florida 32765
(407) 494-0135

Subject: Employment and compensation of Plaintiff, Plaintiff's duties, Plaintiff's schedule and hours worked, and the like.

- II. A general description, including location of all documents, data, compilations, and tangible things in possession, custody or control of that party that are likely to bear significantly on the claims and defenses:
- a. Pleadings, discovery responses and production, exhibits and other papers filed or served in this case.**
 - b. Documents and information relating to plaintiffs' allegations of violation of FLSA and labor laws.**
 - c. Plaintiffs' compensation records.**
 - d. Plaintiffs' time records.**
 - e. Plaintiffs' personnel records.**
- III. A computation of each category of damages claimed by the disclosing party: **None.**
- IV. The existence of any contents of any insurance agreement under which any person or entity carrying on any insurance business that may be liable to satisfy part or all of the judgement that may be entered in the action or indemnify or reimburse for payments made to satisfy the judgment, making available such agreement for inspection and copying under Rule 34: **None.**

Defendants reserve the right to supplement this disclosure statement as required by the Federal Rules of Civil Procedure.

Dated this 7th day of April, 2023.

Respectfully submitted,
SPIRE LAW, LLC
2572 W. State Road 426, Suite 2088
Oviedo, Florida 32765

By: /s/ Ian E. Smith
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Attorney for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of April, 2023, I electronically served the foregoing to Matthew J. Blit and Justin S. Clark, Levine & Blit, PLLC mblit@levineblit.com jclark@levineblit.com. Erik M. Bashian, Bashian & Papantoniou, P.C. eb@bashpaplaw.com.

/s/ Ian Smith
Attorney